

0009

Incoming
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From: Joe Helfrich
To: OGMCOAL
Date: 3/9/2009 9:12 AM
Subject: Fwd: Alton Sage-Grouse Habitat Mitigation Plan
Place: OGMCOAL

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Please file in Alton C/025/0005.....thanks, Joe

>>> <Nathan_Darnall@fws.gov> 3/5/2009 5:59 PM >>>

The U.S. Fish and Wildlife Service (Service) appreciates the opportunity to review and comment on the 15-page Alton Sage-Grouse Habitat Mitigation Plan (Plan) for the Coal Hollow Project. The Plan was referenced as Appendix 3-5 in chapter three of the Coal Hollow Mining and Reclamation Plan for the Alton Coal Development (Coal Hollow Mine). Our review finds that the Plan includes a number of practical mitigation goals and objectives; however, we believe there are a number of modifications or additional actions that would improve the Plan. Please bear in mind that our analysis is hampered by not having access to maps, specific acreages and location data that might be available in other appendices or contained in other portions of the larger document and that these may address some of our questions and concerns.

The goals of the Plan are to sustain the existing sage-grouse population during mining operations and to provide optimal habitat conditions after mining operations are complete. This will be accomplished through specific habitat conservation and mitigation actions, but in general include removal of juniper trees, reclaiming mined lands, and through setting aside a habitat conservation area that will not be mined. The Plan identifies five primary goals for the Alton greater sage-grouse population, and we will address each of the goals separately.

1) Minimize impacts to the birds from the mining activities

The first goal is to minimize impacts from mining activities to the greater sage-grouse population, and the Plan proposes two actions to accomplish this. The first one is an attempt to lure the grouse away from the current lek to a nearby location. If successful, this would shift the mating activities of the grouse away from planned mining activities. The Plan cites only one reference (Eng et al. 1979) suggesting that this may work. We recommend the Plan discuss additional studies or examples where this has worked successfully or where it has been tried and failed and to compare conditions between these studies and the Coal Hollow Mine.

The Plan does not provide the distances from the nearby alternative site to the existing lek or the mining activities; this information would be useful in evaluating whether the action is likely to succeed based on the anticipated levels of noise and human disturbance and in comparison to the study by Eng et al. (1979). If the site is too close to mining activities, it is unlikely to succeed; however, trying to lure the birds over too great a distance may also prove ineffective. The Plan should also discuss or evaluate the habitat features of the new site and whether they are conducive to sage-grouse lekking.

The second action that may minimize impacts to birds is to stockpile spoils from mining operation up to 20 feet higher on a ridgeline, which may create a more distinct visual barrier than currently exists. This barrier between the mining activities and the conservation area may benefit the birds by blocking the view of human activities and may reduce noise levels. However, the berm should be evaluated for its ability to serve as a perch or hiding place for predators and/or whether the grouse consider the feature a threat. It would be helpful for evaluation purposes to understand where the ridge is located in relation to the conservation area,

evaluating the success of the Conservation Area.

4) Provide a corridor between north (Heut's Ranch) and south (Alton Sink Valley) populations to promote gene transfer and increase population numbers

The fourth goal is to reestablish connectivity of the grouse populations between the Alton and Heut's Ranch by removing juniper trees from approximately 1700 acres of land between these two areas. Existing studies show that there is already some movement of birds between Alton and Heut's Ranch; therefore, this action may increase future movement and/or genetic diversity; however, it is uncertain whether this action alone will result in the desired outcome. One of the purposes of this action is to facilitate a more rapid recovery of the Alton grouse population after the mining is completed (i.e., through greater connectivity); however, this assumes that there is a viable grouse population at Heut's Ranch in the future. We recommend the Plan include additional actions to protect and improve the habitat quality near Heut's Ranch. We also recommend that junipers be removed with a bullhog that grinds the trees rather than pulling and removing them. Tree removal activities should occur outside the avian nesting season.

5) Restore land disturbed by mining activities to enhance sage-grouse habitat

The fifth goal in the Plan is to restore the sagebrush habitat to pre-disturbance conditions or to better condition in some cases. We agree that the land has potential for improvement. We recommend that the Plan include objectives for plant diversity, composition and cover, and that habitat metrics for pre- and post-mining be identified and data collected. The Plan calls for returning the vegetation to pre-mining conditions; however, if there is an opportunity to improve habitat conditions, that should be explored. We agree that seed mixes for reclamation should include native shrub, grass and forb species; however, seed mixes often include cattle-specific forage species that may or may not be the best suited for sage-grouse. We recommend the Plan disclose the seed mix so it can be evaluated. And while forbs seed may be more expensive compared to grass seeds, the mix should include adequate numbers of appropriate forbs.

The Plan also anticipates the planting of bareroot or containerized sagebrush and bitterbrush transplants. We agree that this practice may speed the reclamation process. We recommend success criteria (e.g., percent survival to second or third summer) be included in the Plan and that maintenance needs (e.g., watering) be included, if needed. Bareroot and containerized plants (due to their greater expense) should be in addition to and not in place of forbs seed.

The Plan does not specify the timeframe for restoration, but we assume it will occur as mining is finished on each parcel. The Plan did not mention weed control, but this may need to be included. It appears the vegetation and habitat will be monitored, but we recommend that the grouse also be monitored.

Again, we appreciate the opportunity to comment on the Alton Sage-Grouse Habitat Mitigation Plan.